

Kiandria Demone Boyce  
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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

Case No.: 6:25-cv-01272-AA

**Kursten Owen (individually and d/b/a  
Elegance & Geekery LLC),**

Plaintiff,

v.

**EXHIBIT INDEX**

**Breana Askew (individually and d/b/a  
Breromi),  
Kiandria Demone Boyce,  
and Does 1–100,**

**IN SUPPORT OF DEFENDANT  
KIANDRIA DEMONE BOYCE’S  
MOTION TO DISMISS**

Defendant(s).

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The following exhibits are submitted in support of Defendant’s Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue, or in the Alternative, to Transfer Venue:

- **Exhibit A** – Attorney Rejection Correspondence

Emails and letters from Oregon attorneys declining to take Defendant’s case.

*Relevance:* Demonstrates the undue burden of defending in Oregon without access to local counsel, supporting the “fair play and substantial justice” analysis under *Asahi*.

- **Exhibit B** – Email Exchange with Plaintiff’s Pro Bono Counsel

Automated email response showing that Plaintiff’s listed pro bono attorney no longer represents her.

*Relevance:* Confirms Defendant attempted to confer in good faith under LR 7-1, but conferral was impracticable. Shows Defendant’s procedural good faith and Plaintiff’s shifting representation.

- **Exhibit C** – LinkedIn Screenshot (Albany, Oregon Reference)

Screenshot forwarded to Defendant by a third party, listing “Albany, Oregon” under Caleb Owens, a presumed relative identified as “product developer.”

*Relevance:* The only Oregon reference was incidental, came from a third party, and was not emphasized by Defendant. Undercuts Plaintiff’s claim of “express aiming” at Oregon under *Walden* and *Calder*.

- **Exhibit D** – Email Tracking Evidence

Documentation disproving Plaintiff’s claim that Defendant opened an email using tracking software.

*Relevance:* Demonstrates Plaintiff’s reliance on unreliable, easily manipulated digital “evidence,” raising due process concerns and showing lack of purposeful contacts with Oregon.

- **Exhibit E** – Marketing Inconsistencies Screenshots

Screenshots showing a different woman’s face used in marketing and Caleb Owens listed as product developer, while Plaintiff claimed to be the sole inventor.

*Relevance:* Confirms Defendant's commentary addressed product confusion and consumer issues, not Plaintiff's residence or location. No purposeful targeting of Oregon.

- **Exhibit F – Viral Conversation and Plaintiff's Publicizing of Case Filings**

Screenshots showing multiple individuals commenting on Plaintiff and her business before Defendant ever posted, along with screenshots of Plaintiff linking to her own case filings and allowing them to remain visible in public comments.

*Relevance:* Demonstrates that the social media discussion about Plaintiff was already a viral, national conversation before Defendant joined it, and that Plaintiff herself engaged in and contributed to spreading it by publicizing her own case filings. Plaintiff's selective decision to sue only Defendant, while ignoring others who posted earlier or more directly, undermines her jurisdictional theory and confirms that Defendant did not purposefully target Oregon.

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Respectfully submitted,

Dated: September 15, 2025

/s/ Kiandria Demone Boyce

Kiandria Demone Boyce

Defendant, Pro Se